

APR 29 2010

Paul Rosasco, P.E.
Engineering Management Support, Inc.
7720 West Jefferson Avenue, Suite 406
Lakewood, Colorado 80235

Dear Mr. Rosasco:

Re: Revision 1 Work Plan for Supplemental Feasibility Study, Radiological-Impacted Material Excavation Alternatives Analysis, for West Lake Landfill Operable Unit 1, March 29, 2010

The United States Environmental Protection Agency (EPA) has reviewed the subject document received via electronic mail on March 29, 2010, and finds it to be generally acceptable. EPA hereby approves the document with the following comments which are intended to provide additional clarity.

1. ✓ Section 1.2: In the second sentence, delete the phrase beginning with "including" and ending with "(EPA, 1991a)" so that the sentence reads "Based on the results of the OU-1 RI, six potential remedy alternatives..."
2. ✓ Section 1.3: Add the following sentence at the end of the section after the sentence ending in "...are specified in the ROD": "Additional performance standards were identified and will be incorporated into the remedial design as a result of subsequent discussions between EPA Region 7 and EPA's Office of Superfund Remediation and Technology Innovation."
3. ✓ Section 1.4, second bullet: Add the phrase "... if a suitable location outside the geomorphic flood plain can be identified" after "... on-site engineered disposal cell with a liner and cap."
4. ✓ Section 2.1.2, third paragraph: Add the following sentences at the end of the paragraph, after the sentence ending in "... no longer be required": "EPA's policies pursuant to CERCLA and the NCP do not require removal of all radionuclides. The radionuclide levels that would remain with Radiological Areas 1 and 2 under the "complete rad removal" alternative would be protective of human health for reasonably expected future exposure scenarios."
5. ✓ Section 2.1.2, fourth paragraph: Add the phrase "...using standard Risk Assessment Guidance for Superfund (RAGS) methodology and site-specific exposure factors..." after "...would be 2.6 pCi/g,"
6. ✓ Section 2.4.3: Add the phrase "...and found to be at or below cleanup levels" after "... results for Th-230 are reported."
7. ✓ Section 2.7, second paragraph: In the first sentence, replace "cursory" with "preliminary."
8. ✓ Section 2.7, sixth paragraph: In the third sentence, remove the word "mixed" after "... these types of..."

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9. ✓ Section 2.8: Add "... if a suitable location outside the geomorphic flood plain can be identified" to the end of the first sentence.
10. ✓ Section 2.11, third paragraph: EPA does not object to the use of the RESRAD-Off-site model to evaluate radiological risks in all applicable exposure media. However, EPA requires that a parallel set of risk calculations for air be conducted using the Building PRG (BPRG) methodology to confirm the RESRAD-Off-site results. EPA also requires that a parallel set of groundwater flow models and fate and transport calculations be conducted using an appropriate stand-alone groundwater model, such as HYDRUS or MODFLOW, to confirm the RESRAD-Off-site results.
11. ✓ Section 2.12, fourth paragraph: In the first sentence, delete the duplicated word "that."
12. ✓ Section 3.1, second paragraph: Add the phrase "... that meet the threshold criteria" after "...tradeoffs among alternatives..."
13. ✓ Section 4, bullet A: This bullet should read "Applicable or relevant and appropriate requirements."

Please provide a hard copy of the document which implements these changes to the text and a revised title page to indicate the document is the final work plan. If you have any questions, you may contact me at (913) 551-7324.

Sincerely,

Daniel R. Gravatt
Remedial Project Manager
Missouri/Kansas Remedial Branch
Superfund Division

cc: Shawn Muenks, Missouri Department of Natural Resources
Mike Hockley, Spencer Fane Britt & Browne
Rich Kapuscinski, EPA HQ (e-mail only)
Charlotte Neitzel, Holme Roberts & Owen (e-mail only)
Christina Richmond, U.S. DOJ for U.S. DOE (e-mail only)
Kate Whitby, Spencer Fane Britt & Browne (e-mail only)
Bill Beck, Lathrop & Gage (e-mail only)

bcc: Cheryle Micinski, CNSL